# CBS MEMORANDUM

FROM: Irv Drasnin
TO: ROBERT CHANDLER, DAVID FUCHS
DATE: July 7, 1977

With respect to the alleged case of Uhl vs. CBS (re: "The Guns of Autumn"), I offer these comments on the following points as listed in the complaint.

6. There should be no misunderstanding about the use of the word "directed" in this paragraph. Neither I nor any member of the crew gave any directions to Mr. Uhl or other members of his party. All hunters using Pymatuning are assigned ("directed") hunting locations by Game Department officials. Any such directions to Mr. Uhl or members of his party were given by them, not by us. The same applies to the wording of the complaint which reads "he was directed to engage in the sport of goose hunting."

7. Again, any directions given to Mr. Uhl with respect to his location or hunting activities were given by a member of the Pennsylvania Game Commission and not by us. We merely requested of Game Commission representatives any location where we might film goose hunting from a blind.

8. We were escorted to the blind where Mr. Uhl and his party were located by members of the Pennsylvania Game Commission and had every reason to assume that our identity was known and our presence welcome. As any hunter knows, a goose blind is not a place for conversation or any other activity which might serve to discourage geese from entering the area. However, there were instances of whispered and convivial remarks between members of the CBS crew and the hunting party and at no time throughout the incident in question was there any indication that the hunters did not know who we were, what we were doing there, or that we were not welcome. At no time were we out of sight of the hunters; indeed, we could not have been more than five feet away from them during the time we shared the blind and during which the hunting episode took place.

9. During the course of filming this hunting sequence, geese were filmed both in the air and on the ground--in each instance a common occurrence. At no time did I or did any member of the CBS crew "urge" Mr. Uhl or any in his party to shoot geese whether on the ground or in the air; nor to my knowledge were the geese on the ground when the shots were fired, nor was it so depicted in the broadcast.

   I have taken another look at this sequence as it was broadcast. There is nothing in it to demonstrate beyond a doubt exactly where the geese were when shot. The rifles visible in the picture were approximately parallel with the ground when fired, which seems to me to indicate that the geese were neither very high in the sky nor on the ground but in the process of either taking off or landing. In any case, the firing of the shots was a decision made strictly by the hunters themselves without any direction or encouragement from any member of the crew (including myself).

10. The reference in this paragraph to the location of the geese when they were shot would seem to support the above (re: point 9).

11. Frankly, I don't understand the point being made here. However, I can assure you that just as we gave no directions to the hunters, neither did we give any to the geese, dead or alive. The camera crew followed the hunters out of the blind, and recorded picture and sound of the retrieval of the geese that had been shot, as it happened. In the broadcast, it is one of the hunters who asks one of his hunting companions what he should do about the goose that he has shot and is carrying by the neck and which apparently is not yet dead.

13. The allegation that "through the process of editing and splicing and otherwise manipulating the film taken during the goose hunting activities...(we)...intentionally and knowingly created the appearance that (Mr. Uhl) had in fact engaged in shooting geese which were on the ground at the time of the shooting" is, I believe, covered and refuted in the above. But since at the time the shots were fired the camera was on the hunters and not the geese (and because my view was obstructed by the cornstalks that constituted the blind), I cannot state with certainty exactly where the geese were when they were shot.

14. No comment except to say that while the cited code of conduct may exist, that doesn't mean it is always practiced. (Does this mean that it is sporting to shoot a goose or duck that is one or two feet off the ground since therefore they are "in the air"?) In any case we did not seek to nor did we in fact take a position or pass judgment on this issue in the broadcast but simply filmed and reported what took place.

Finally, at no time during the broadcast was the issue of the so-called "slob hunter" either raised or addressed (see points 15, 16, 17 and 21 of complaint). The assumptions and allegations contained in the complaint are untrue and in my opinion the extraordinary delay in the plaintiff's raising of them, if for no other reason, leaves them suspect. I hope I have covered the salient points. Please let me know if I have not or if there are any other questions you wish covered.